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Attorneys for Plaintiff Allstate Insurance Company

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ALLSTATE INSURANCE COMPANY,	: ECF CASE
	:
Plaintiff,	: Civ. A. No. 13-7211 (JBW) (JMA)
	:
v.	: NOTICE OF MOTION FOR
	: EXPEDITED DISCOVERY AND TO
YANNIS SIDAKIS, ANDREW SIDAKIS, ANNA	: PRESERVE EVIDENCE
ANASTASOPOULOS, and FRANCES BOULAS,	:
	: (Oral Argument Requested)
Defendants.	:
	:
----- X	

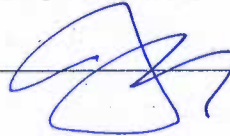
PLEASE TAKE NOTICE that upon the accompanying Declaration of James S. Yu, dated December 20, 2013, together with Exhibits A annexed thereto, the accompanying Memorandum of Law, and upon all the pleadings and proceedings herein, Plaintiff Allstate Insurance Company ("Allstate"), by its undersigned counsel, will move this Court on January 15, 2014, at 10:00 a.m., or alternatively at a date and time to be determined by the Court, before The Honorable Jack B. Weinstein, United States District Judge, Eastern District of New York, at the United States Courthouse, 225 Cadman Plaza east, Brooklyn, New York 11201, for entry of the

accompanying proposed form of Order: 1) allowing Allstate to conduct limited, expedited discovery on issues raised in Allstate's Verified Complaint; and 2) directing Defendants Yannis Sidakis ("Yannis"), Andrew Sidakis ("Andrew"), Anna Anastasopoulos ("Anna") and Frances Boulas ("Frances") (collectively, "Defendants") to preserve evidence, including but not limited to, all discs and electronic data storage devices in their possession, custody or control on which Allstate's trades secrets and other confidential information may currently or have previously resided.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1, Plaintiff's answering papers to this motion, if any, are to be served on or before seven (7) days after service of the moving papers, and Plaintiff's reply papers, if any, are to be served within two (2) days after service of the answering papers.

DATED: December 20, 2013

Respectfully submitted,



Attorneys for Plaintiff Allstate Insurance Company

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